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August 17, 2021

Via ECF

Hon. Analisa Torres, U.S.D.J. United States District Court Southern District of New York 500 Pearl Street New York, NY 10007

Re: Requests for 14-Day Extension of Time to Submit Joint Pretrial Order and Related Submission by August 31, 2021

Yuan et al v. & Hair Lounge Inc. et al, No. 18-cv-11905 (AT) (BCM), (S.D.N.Y.)

Dear Honorable Analisa Torres,

This office represents the Plaintiffs in the above-referenced matter. We write jointly with Defendants' counsel to request a 14-day extension of time to submit joint pretrial order and related submission by August 31, 2021. Pursuant to Your Honor's Order dated April 01, 2021, the parties shall submit the above-mentioned briefs by August 17, 2021.

This is the parties' first request for extension in this matter and it is respectfully submitted that granting such request will not prejudice any party since a trial date did not set forth and because Defendants, in their letter dated August 11, 2021, saying that Defendant Lu is not available for the forth calendar quarter of 2021 for the trial due to family emergency.

Plaintiff's counsel respectfully apologizes for not having formally pursued an extension of time at an earlier juncture, at least two (2) business days prior to the deadline, in accordance with Your Honor's Individual Rule I.C. Plaintiff's counsel was preoccupied with prior deadlines for the last few weeks since July, including a couple of depositions, pre-scheduled court appearances, and jury trials. As of submitting this request, Plaintiff's counsel is in the middle of a bench trial in another unrelated action. Plaintiff's counsel will work diligently with Defendants' counsel to keep up and complete the submission of joint pretrial order by the new proposed deadlines.

We sincerely apologize for any inconvenience caused to this Court and respectfully thank the Court for its time and consideration in this matter.

GRANTED. By **November 3, 2021**, the parties shall submit blackout dates for trial covering the first quarter of 2022.

SO ORDERED.

Dated: August 18, 2021

New York, New York

ANALISA TORRES
United States District Judge